

Kubeczko, Dave

From: Kubeczko, Dave
Sent: Monday, December 26, 2011 6:40 PM
To: Kubeczko, Dave
Subject: FW: Kinder Morgan CO2 CO LP, Doe Canyon 11 Pad, NESW Sec 15 T40N R18W, Dolores County, Form 2A (#400226971) Review

Categories: Orange - Operator Correspondence

Scan No 2034105 CORRESPONDENCE 2A#400226971

From: Amanda Stenjem [\[mailto:stenjem@ecosphere-services.com\]](mailto:stenjem@ecosphere-services.com)
Sent: Monday, December 19, 2011 10:47 AM
To: Kubeczko, Dave
Subject: RE: Kinder Morgan CO2 CO LP, Doe Canyon 11 Pad, NESW Sec 15 T40N R18W, Dolores County, Form 2A (#400226971) Review

Hi Dave, Kinder Morgan concurs with the following COAs. Can you please send me them as an attachment and I will include them in the Form 2A.

Thanks Dave,
Amanda

From: Kubeczko, Dave [\[mailto:Dave.Kubeczko@state.co.us\]](mailto:Dave.Kubeczko@state.co.us)
Sent: Monday, December 12, 2011 2:42 PM
To: Carolyn Dunmire
Subject: Kinder Morgan CO2 CO LP, Doe Canyon 11 Pad, NESW Sec 15 T40N R18W, Dolores County, Form 2A (#400226971) Review

Carolyn,

I have been reviewing the Doe Canyon 11 Pad **Form 2A** (#400226971). COGCC would like to attach the following conditions of approval (COAs) based on the information submitted by Kinder Morgan on the Form 2A prior to passing the Oil and Gas Location Assessment (OGLA) review.

1. **Construction (Section 6):** The box answering the question will salt (>15,000 ppm TDS Cl) or oil based muds be used? has been marked **Yes**; therefore the following conditions of approval (COAs) will apply:
 - COA 11** - Either a lined drilling pit or closed loop system must be implemented.
 - COA 12** - Production pit/special purpose pit must be lined.
2. **General:** Due to the potentially permeable nature of the surface material in this area, the following conditions of approval (COAs) will apply:
 - COA 23** - Operator must ensure 110 percent secondary containment for any volume of fluids contained at well site during drilling and completion operations; including, but not limited to, construction of a berm or diversion dike, diversion/collection trenches within and/or outside of berms/dikes, site grading, or other comparable measures (i.e., best management practices (BMPs) associated with stormwater management) sufficiently protective of nearby surface water. Any berm constructed at the well pad location will be stabilized, inspected at regular intervals, and maintained in good condition.
 - COA 5** - Operator must implement best management practices to contain any unintentional release of fluids, including any fluids conveyed via temporary surface pipelines or buried permanent pipelines.
 - COA 25** - Flowback and stimulation fluids must be sent to tanks, separators, or other containment/filtering equipment before the fluids can be placed into any pipeline or pit located on the well pad or into tanker trucks for offsite disposal. The flowback and stimulation fluid tanks, separators, or other

containment/filtering equipment must be placed on the well pad in an area with additional downgradient perimeter berming. The area where flowback fluids will be stored/reused must be constructed to be sufficiently impervious to contain any spilled or released material. **COA 23** - Operator must ensure 110 percent secondary containment for any volume of fluids contained at well site during drilling and completion operations; including, but not limited to, construction of a berm or diversion dike, diversion/collection trenches within and/or outside of berms/dikes, site grading, or other comparable measures (i.e., BMPs associated with stormwater management) sufficiently protective of the nearby surface water.

COA 38 - The moisture content of any drill cuttings in a cuttings pit, trench, or pile shall be as low as practicable to prevent accumulation of liquids greater than de minimis amounts prior to offsite disposal.

COA 39 - No portion of any pit that will be used to hold liquids shall be constructed on fill material, unless the pit and fill slope are designed and certified by a professional engineer, subject to review and approval by the director prior to construction of the pit. The construction and lining of the pit shall be supervised by a professional engineer or their agent. The entire base of the pit must be in cut.

COA 49 - All personnel must be H₂S trained and proper air monitoring for H₂S must be implemented during drilling, completion, and production operations. Emergency response plan for H₂S must be onsite at all times.

COGCC would appreciate your concurrence with attaching these COAs to the Form 2A permit prior to passing the OGLA review. If you have any questions, please do not hesitate to call me at (970) 309-2514 (cell), or email. Thanks.

Dave

David A. Kubeczko, PG
Oil and Gas Location Assessment Specialist

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